

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

v.

JEREMY REASON

*

CRIMINAL NO:

*

SECTION:

*

VIOLATION: 18 U.S.C. § 2252(a)(4)(B)
18 U.S.C. § 2253

*

* * *

FACTUAL BASIS

Should this matter proceed to trial, both the government and the defendant, **JEREMY REASON**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would prove the following beyond a reasonable doubt at trial:

The government would show that at all times mentioned in the Bill of Information, the defendant, **JEREMY REASON**, was a resident of the Eastern District of Louisiana, living in Metairie, Louisiana.

The government would present evidence that on or about August 23, 2007, Special Agents from the U. S. Department of Homeland Security, Immigration and Customs Enforcement (ICE), obtained a federal search warrant, based on probable cause, for the defendant's Edenborn Avenue

apartment located in Metairie, Louisiana. Agents would testify that they recovered a computer and CDs from the defendant's apartment.

The government would establish through testimony and documentary evidence that **JEREMY REASON** knowingly used his computer to search for, download, and save images of child pornography. Further, the evidence and testimony would establish that a computer forensic search of **JEREMY REASON**'s seized computer and related evidence revealed approximately 500 images depicting the sexual victimization of children.

Further, the government would introduce through ICE agents statements wherein **JEREMY REASON** voluntarily admitted to federal agents that he knowingly downloaded images of child pornography to his computer. According to **REASON**, he used the file sharing peer-to-peer programs BearShare and KaZaa to download and save child pornography to his computer. **REASON** said he only looks at child pornography every few days. **REASON** said that he is sexually attracted to child porn. In addition, **REASON** was shown several pages of images of child pornography which **REASON** signed and told the agents that he recognized the images from his computer.

Forensic evidence consisting of medical testimony, law enforcement officers, and supporting documentation would establish that some of the child victims depicted in the images possessed by **REASON** were of real, identifiable victims, less than the age of eighteen (18) at the time the child pornography was created.

Testimony would establish that some of the child victims depicted in the materials possessed by **JEREMY REASON** were of prepubescent children less than 18 years of age; to wit: less than twelve (12) years old and that the images of the child victims were engaged in "sexually explicit


conduct” as defined in Title 18, United States Code, Section 2256. These images included pictures of adult males vaginally and/or anally penetrating minor victims and minors performing oral sex on adults. All of the images of child pornography possessed by the defendant, would be introduced through the testimony of ICE agents.

Further, the government would present evidence that would establish that the images of child pornography had been transported in interstate and foreign commerce via computer.

Further, the government would show through testimony and documentary evidence that the equipment used by the defendant to acquire the child pornography was transported in interstate or foreign commerce.


JEREMY REASON
Defendant

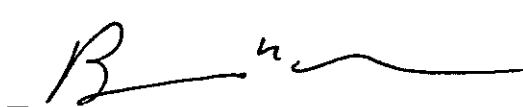
5/20/08
DATE


MICHAEL CIACCIO
Counsel for Defendant

6/27/08
DATE


MICHAEL CALOGERO
Counsel for Defendant

5/20/08
DATE


BRIAN M. KLEBBA
Assistant United States Attorney

6/27/08
DATE